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9/30/2022
OK - Remm
branch

MEMO ENDORSED

September 26, 2022

Via ECF

Honorable Colleen McMahon

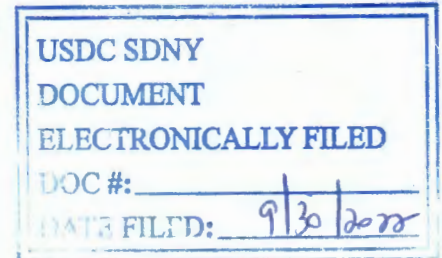
Daniel Patrick Moynihan United States Courthouse

500 Pearl Street

New York, New York 10007-1312

RE: United States v. Tiran Branch
22 cr 82(CM)

Dear Judge McMahon,



I represent Tiran Branch in the above matter. I am writing to request that his electronic monitoring bracelet be removed.

Tiran Branch has been employed as a Driver Sales Representative for XPO Logistics. As such, Tiran Branch has been and continues to be required to drive freight loads to various locations inside and outside of New York State. Tiran Branch is on electronic monitoring through use of an electronic ankle bracelet.

I have been informed by Pre-Trial Officer Leo Barrios that he agrees that the ankle bracelet is no longer a necessary component of Mr. Branch's release restrictions. Pre-Trial Officer Leo Barrios has informed me and the Government that he consents to removal of the bracelet and electronic monitoring. Mr. Barrios has stated that Mr. Branch has been working driving trucks long-distance and locally since he was placed on electronic monitoring and Pre-Trial Services has had no issues with Mr. Branch's compliance. Additionally, I am informed by AUSA Ashley Nicolas that the Government will defer to the decision of Pre-Trial Services.

For the foregoing reasons I ask that the Court permit Tiran Branch to have his electronic ankle bracelet removed and that electronic monitoring no longer be deemed a condition of release.

Sincerely,

Kyle B. Watters

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